

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**ROW VAUGHN WELLS, INDIVIDUALLY)
AND AS ADMINISTRATRIX OF THE)
ESTATE OF TYRE DEANDRE NICHOLS,)
DECEASED,)**

Plaintiffs,)

v.)

**THE CITY OF MEMPHIS, a municipality, *et*)
al.,)**

Defendants.)

**CASE NO. 2:23-CV-02224
JURY DEMAND**

GUARDIAN AD LITEM'S MOTION FOR STATUS CONFERENCE

COMES NOW the duly appointed *Guardian ad litem*, **CHASITY S. GRICE**,
(**HEREINAFTER REFERRED TO AS “*Guardian ad litem*”**), moves this Court to set a
status conference and to discuss the scope of the *Guardian ad litem* appointment in these
proceedings. In support of her Motion, the *Guardian ad litem* states as follows:

I. FACTUAL BACKGROUND

1. On November 8, 2023, the Shelby County Probate Court appointed Plaintiff as
Administratrix of the Estate of Tyre Deandre Nichols (“Decedent”). The Order stated
that Decedent died intestate and that his heir-at-law is his Minor Child. The Order
further gave Plaintiff the authority to pursue any and all litigation, in any and all
courts, on behalf of Decedent. ([177-Nichols] *City of Memphis' Motion For the
Appointment of Guardian Ad Litem*). On April 5, 2024, Defendant, City of Memphis,
filed a Motion to Appoint *Guardian ad litem*, indicating its concern that a conflict

existed when evaluating a settlement that would resolve both the claims of Plaintiff and Minor Child and requesting that a *Guardian ad litem* be appointed to represent the interests of the minor child ([177-Nichols] *City of Memphis' Motion For the Appointment of Guardian Ad Litem*). On September 16, 2024, the Court granted the City of Memphis' Motion for the Appointment of a *Guardian ad litem* ([202-Nichols] *Order Granting Motion for Appointment of Guardian Ad Litem*).

II. REQUEST FOR STATUS CONFERENCE

In light of the above, the Guardian ad litem now seeks the Court's guidance on the following issues to effectively fulfill the role and ensure the Minor Child's best interests are safeguarded:

1. **Participation in Settlement Negotiations:** Clarification on the *Guardian ad litem's* involvement in any settlement discussions and the extent of authority to negotiate on behalf of the Minor Child.
2. **Representation in Court Proceedings:** Guidance on the specific court appearances and filings where the presence and advocacy of the *Guardian ad litem* are required.
3. **Reporting and Communication:** Defined expectations for reporting to the Court and maintaining communication with other parties involved in the litigation to keep the proceedings transparent and in the best interest of the Minor Child.
4. **Billing for Services:** Defined expectations regarding regular billing and the responsibilities of the parties for the payment of said billing and services.

WHEREFORE, *Guardian ad litem* respectfully requests that this Honorable Court either grant this said motion for a status conference to address and clarify the aforementioned

issues concerning the scope and responsibilities of the Guardian ad litem in these proceedings or that this Honorable Court enter an Order clarifying same.

Respectfully Submitted,

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By: **/s. Chasity S. Grice**
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Guardian ad litem

CERTIFICATE OF SERVICE

I, Chasity S. Grice, hereby certify that on October 16, 2024, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, and that upon filing, such system will serve a copy of the foregoing pleading upon all counsel of record in this action.

/s/ Chasity S. Grice
Chasity S. Grice